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April 28, 2021

VIA ECF
Judge Ona T. Wang
United States Magistrate Judge
United States District Court
500 Pearl Street
New York, NY 1007

> **MEMO ENDORSED**

Re: Calle Jara v. Manna 2nd Ave LLC et al
CASE #:   1:18-cv-02871-OTW

Your Honor:

This office represents Plaintiff in this matter. We submit this letter to respectfully request an adjournment of the time to submit the supplemental pre-trial memorandum of law analyzing the executive exemption as it applies to chefs in this case. Dkt. No. 123.

Plaintiff originally submitted a memorandum of law as to executive exemptions generally. The Court directed Plaintiff's counsel to supplement the analysis as to executive chefs. The Court directed Plaintiff to submit the supplemental memorandum of law on April 30, 2021. Dkt. No. 123. There has been no previous request to adjourn this submission. The Defendant consents to this request. The reason for the request is to spend additional time providing a comprehensive analysis of the issues in the executive exemption for the Court.

Accordingly, Plaintiff respectfully requests until June 15, 2021 to submit the aforementioned supplemental memorandum of law. We would also respectfully request that Defendant's time to respond would also be extended from May 21, 2021 to July 6, 2021.

We thank the Court for the time and attention devoted to this matter.

Application **DENIED**. Plaintiff shall file his supplemental memorandum of law by **May 28, 2021**. Defendants' responsive brief is due **June 18, 2021**. The parties' three "bad dates" for trial and updated proposed JPTO with revised stipulated facts are due **today, April 30, 2021** pursuant to ECF 133 and the instructions given at the April 21, 2021 conference.

SO ORDERED.

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Ona T. Wang 4/30/21
U.S.M.J.

Respectfully submitted,

By: _____/s/ Clifford R. Tucker_____
        Clifford R. Tucker, Esq.